

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

AETNA INC. v. ALL MARKET PRODUCTS & SERVICES, LLC, et al.	Case No. 2:16-cv-01819-JAD-PAL
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DEFENDANT ALL MARKET PRODUCTS' ANSWER

Defendant All Market Products & Services, LLC (d/b/a Dental Shield USA) ("All Market Products" or "Defendant"), through undersigned counsel, hereby responds to Aetna Inc. ("Aetna" or "Plaintiff") as follows:

PRELIMINARY STATEMENT

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.
2. Denied.
3. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding co-Defendant Dental Club. Denied as to the remaining allegations in the paragraph.
4. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding consumer complaints. Denied as to the remaining allegations in the paragraph.

5. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding consumer complaints. Denied as to the remaining allegations in the paragraph.

6. Denied as to any allegations of wrongdoing. The allegations of the rest of the paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

THE PARTIES, JURISDICTION AND VENUE

7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

The Dental Shield Defendants

8. Admitted.

9. Admitted.

10. Denied.

The Dental Club Defendants

11. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

12. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

Jurisdiction and Venue

14. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

15. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

16. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

17. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

18. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

BACKGROUND FACTS COMMON TO ALL COUNTS

The Aetna Trademarks

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

20. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

The Aetna Trademarks Are Famous and Valuable

21. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

Aetna Dental Access

22. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

23. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

Defendants' Unlawful Conduct

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

Aetna Attempts to Resolve the Issues

29. Denied as to allegations regarding Defendant Dental Shield. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remainder of the

allegations in the paragraph. To the extent a response is required, the statements of that paragraph are denied.

30. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

31. Admitted.

32. Denied.

33. Denied.

34. Denied as to allegations of any wrongdoing. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations in the paragraph. To the extent a response is required, the statements of that paragraph are denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied as to allegations of any wrongdoing. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations in the paragraph. To the extent a response is required, the statements of that paragraph are denied.

40. Denied.

COUNT I

41. Denied.

42. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

43. Denied.

44. Denied.

45. Denied.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

COUNT II

50. Denied.

51. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

52. Denied.

53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

COUNT III

61. Denied.

62. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

63. Denied.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

Respectfully Submitted,

/s/ Eric Menhart

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CERTIFICATE OF SERVICE

I hereby certify that on the date of this filing a copy of the foregoing was served via electronic case filing and all parties of record were served by that system.

/s/ Whitney W. Wilcher
Whitney W. Wilcher, Esq.